

Morgan Lewis

Kenneth I. Schacter
Partner
+1.212.309.6865
kenneth.schacter@morganlewis.com

Via ECF

September 15, 2021

Hon. Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, NY 10007

Re: Palladian Partners, L.P. v. Province of Buenos Aires (Case No. 1:21-cv-5958-CM-KHP)

Dear Judge McMahon:

We are counsel for Palladian Partners, L.P. ("Plaintiff") in the above-referenced action. On July 13, 2021, the Court issued the Summons [Dkt. 6] and entered the *Order Scheduling an Initial Pretrial Conference* (the "Order") [Dkt. 7]. Pursuant to the Order, an initial pretrial conference is set for September 30, 2021 (the "Initial Pretrial Conference"), and a Case Management Plan was due to be filed on August 12, 2021.

On August 10, 2021, we submitted a letter advising the Court that (i) on July 30, 2021, pursuant to the Hague Service Convention, Plaintiff commenced service upon Province of Buenos Aires ("Defendant") by sending the case-initiating documents to Argentina's Central Authority via FedEx, (ii) Defendant has 60 days from the date on which Argentina's Central Authority serves the documents upon Defendant to respond to the Summons and Complaint, and (iii) we planned to provide an update to the Court by September 15, 2021 (the "Letter") [Dkt. 8]. On August 20, 2021, the Court issued an endorsement of the Letter. See Dkt. 9.

To date, Plaintiff has not heard from Defendant or its counsel. We have no information on whether the Summons and Complaint have been delivered to Defendant by the Central Authority. In light of the ongoing service of process procedures required by the Hague Convention, we respectfully request that the Court adjourn the Initial Pretrial Conference for a period of approximately 45 days. We propose to (i) update the Court on the status of service by October 15, 2021, and, if counsel for Defendant has appeared in the action by then, (ii) submit a joint proposed Case Management Plan on or about that date.

Thank you for your attention to this matter.

Respectfully,

/s Kenneth I. Schacter

Kenneth I. Schacter

Morgan, Lewis & Bockius LLP

101 Park Avenue
New York, NY 10178-0060
United States

T +1.212.309.6000
F +1.212.309.6001